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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

DON'T SHOOT PORTLAND, a nonprofit corporation, in its individual capacity, NICHOLAS J. ROBERTS, in an individual capacity and on behalf of themselves and all others similarly situated, MICHELLE "MISHA" BELDEN, in an individual capacity and on behalf of themselves and all others similarly situated, ALEXANDRA JOHNSON, in an individual capacity and on behalf of themselves and all others similarly situated,

Plaintiffs

v.

CITY OF PORTLAND, a municipal corporation, and MULTNOMAH COUNTY, a political subdivision of the State,

Defendants.

Case No. 3:20-cv-00917-HZ

PLAINTIFFS' UNOPPOSED MOTION
FOR LEAVE TO FILE THIRD
AMENDED COMPLAINT

L.R. 7-1 CERTIFICATION

By and through their respective counsel, the parties have conferred regarding this motion and Defendants do not object.

MOTION

Pursuant to Fed. R. Civ. P. 15 and L.R. 15, Plaintiffs Don't Shoot Portland, Nicholas Roberts, Michelle Belden and Alexandra Johnson move the Court for leave to file their Third Amended Complaint, a copy of which is attached hereto as Exhibit A.

The proposed Third Amended Complaint amends the Second Amended Complaint to address Defendant City's arguments in their recent Motion to Dismiss Plaintiff Don't Shoot Portland from the case, specifically adding factual allegations related to Don't Shoot Portland's

mission and activities and the plaintfffs' First Amendment claims; clarifying allegations under the *Monell* claims; and broadening the dates at issue to include dates since the Second Amended Complaint was filed.

Defendants confirmed in writing that they do not object to the filing of the Third Amended Complaint.

DATED this 1st day of October 2020

s/J. Ashlee Albies

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